



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



476657

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: Request for Approval and Funding for a Time-Critical Removal Action at the Little City Building Site, Ottawa, LaSalle County, Illinois (Site ID # C55U)

FROM: Brad Benning, On-Scene Coordinator *MWR for*
Emergency Response Branch 2, Section 3

THRU: Samuel Borries, Chief *Samuel Borries*
Emergency Response Branch 2

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document your approval to expend up to \$1,162,574 to conduct a time-critical removal action at the Little City Building Site (Site) located in Ottawa, LaSalle County, Illinois. The time-critical removal action proposed herein will mitigate the threats to public health, welfare, and the environment from unsecured asbestos and asbestos containing material (ACM) from a building in imminent threat of collapse. This Site involves a nationally significant issue because the principal contaminant the removal addresses is ACM. However, no precedent-setting issues are associated with this non-NPL Site.

The Action Memorandum would serve as approval for EPA to expend, as the lead technical agency, resources to take actions described herein to abate the imminent and substantial endangerment posed by hazardous substances at the Site. EPA will conduct the removal of hazardous substances pursuant to Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC § 9604(a)(1), and Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. § 300.415.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: ILN000505583

RCRA ID: N/A

State ID: LPC# N/A

Category: Time-Critical Removal Action

A Chicago real estate firm, RJR Properties, has owned the Little City Building (LCB) for over ten years. LCB is a five-story commercial building located on a main street in downtown Ottawa. RJR began to clean up and repair the building for possible redevelopment and/or sale. A masonry contractor hired to repair to the west exterior wall of the building damaged the roof which resulted in extensive water infiltration and major structural damage to the interior of the building. In 2010, RJR allowed a prospective buyer to have long-term access to the building to perform cleaning and repair. However, the buyer gutted the building for scrap, causing major flooding from broken plumbing, severe structural problems, and the release of ACM throughout the building. A subsequent attempt by RJR to sell the building was unsuccessful due to the ACM release and structural concerns. RJR offered to donate the building to the City of Ottawa, as it no longer had financial resources to address the deteriorating conditions in the building. The City hired consultants to conduct asbestos and structural surveys of the building in 2014, which confirmed ACM release and imminent structural concerns. The City requested assistance from EPA due to the escalating costs for ACM cleanup, structural repairs and /or demolition of the building.

EPA conducted an assessment of the LCB Site and found additional structural damage, including a collapsed roof, raising concern that partial or complete structural failure of the building is imminent. The Site was referred to the Region 5 Superfund Program through the Brownfield's Program and the Illinois Environmental Protection Agency (IEPA).

A. Site Description

1. Removal site evaluation

The removal site evaluation utilized data from the Comprehensive NESHAP Asbestos Survey conducted January of 2014, by Midwest Environmental Consulting Services and Building Structural Survey conducted August 2014, by Fehr-Graham Engineering for the City of Ottawa, which documented the following site conditions.

A total of 25 homogeneous areas were sampled, with 12 areas testing positive for asbestos (Chrysotile 1-20%), and one area (boiler insulation) not sampled due to site conditions but assumed to be asbestos. The ACM included air cell pipe insulation, floor tile, mastic, caulking, window glazing and boiler insulation, all mixed with building debris observed throughout all five floors and basement of the building. An estimated 200 linear feet of pipe insulation and 280 square feet of boiler insulation were identified. All asbestos was considered friable.

The bulk sampling strategy was based upon the protocol of homogenous areas established by EPA. A homogeneous sampling area (HSA) is defined as an area of material that is uniform in color, texture, construction, general appearance, and date of installation. Bulk samples of

suspect ACM were analyzed by Polarized Light Microscopy (PLM) utilizing the EPA-600/M4-82-020 Method. Bulk samples were analyzed using Asbestos Hazard Emergency Response Act (AHERA) "positive stop" protocol, meaning each sample of each HAS group is analyzed until asbestos is found in the HAS or all samples in the group are analyzed and are negative for asbestos content.

Fehr-Graham Engineering performed an investigation of the building to ascertain the existing conditions and to make recommendations for necessary shoring and stabilization to allow the asbestos to be mitigated. The collapsed floors along the west elevations have rendered the wall unsupported for its entire height. Masonry walls rely upon the lateral bracing provided by the floor systems. The bowing of the west wall observed from the exterior is consistent with unsupported masonry walls of this height. The sagging floors immediately south of the collapsed bay require shoring along with areas of the fourth and fifth floors. Repairs to all levels require access between floors, which is currently limited due to the poor condition of the stairs. Further, any vibrations that are caused by stabilization work could be detrimental to the exterior masonry walls. Fehr-Graham's professional opinion concludes that without stabilization and re-roofing the building may suffer from a partial or full collapse.

EPA also conducted an assessment of the building on January 28, 2015, to provide a second opinion regarding the structural integrity of the building. A structural engineer from EPA START contractor Tetra Tech inspected the building and agrees with the Fehr-Graham conclusions. Furthermore, additional damage was discovered on the exterior side of the west wall of the building during the site visit, increasing concern that partial or complete structural failure of the building is imminent unless stabilization or controlled demolition measures are taken immediately.

2. Physical location

The Site is located at 112 West Madison Street, Ottawa, LaSalle County, Illinois. The building abuts existing structures to the east with a small alley to the west. A parking lot is situated to the north, and the south face is the original main entrance along the Madison Street sidewalk. The building is in the downtown business district. The Site's geographical coordinates are 41.3468 North latitude and -88.8420 West longitude.

An Environmental Justice (EJ) analysis for the Site was conducted. Screening of the surrounding area used Region 5's EJ Screen Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Region 5 has reviewed environmental and demographic data for the area surrounding the Site at 112 West Madison Street, Ottawa, Illinois, and determined there is a high potential for EJ concerns at this location.

3. Site characteristics

The Site comprises approximately 34,200 square feet, is a five story multi-wythe brick wall and timber floor framed structure constructed in 1902. The building's exterior west wall shows significant signs of failure due to years of water damage. Several windows are now open as past board-up measures have failed. A large area of the roof has collapsed resulting in the pancaking of floor sections on all five stories of the building. Extreme damage to all interior rooms is apparent from many years of neglect and water damage. The City of Ottawa has placed barriers along the south and west perimeters to keep pedestrians clear of the building.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

The Site presents a threatened and an ongoing release of hazardous substances. Past actions to secure the building show evidence of failing, several windows are now open as board-up measures have failed and the roof is partially exposed, posing potential release of ACM to the environment. This building is severely damaged and contains friable ACM throughout the inside which would pose an imminent and substantial threat to public health should the building suffer a catastrophic failure.

5. NPL status

The Site is not on the National Priority List (NPL), nor is it anticipated to be referred to the NPL site assessment program.

6. Maps, pictures and other graphic representations

Figure 1, Site Location Map.

Figure 2, Site Layout Map

Attachment 1, Analytical Results

Attachment 2, Photographs

Attachment 3, Detailed Cleanup Contractor Cost Estimate

Attachment 4, Independent Government Cost Estimate

Attachment 5, Administrative Record

B. Other Actions to Date

1. Previous actions

The City of Ottawa obtained EPA Brownfields Assessment Grants in an effort to spur redevelopment. The asbestos survey and structural inspections were completed under this grant.

2. Current actions

No current response actions have been taken by the building owner. The City of Ottawa has been unsuccessful in its attempts to have the owner address the serious problems of the building

integrity. The City is currently monitoring the building condition and maintaining barricades to protect pedestrians walking near the Site. The City requested bids for stabilization and asbestos mitigation in hopes to save the structure for possible redevelopment. The combined cost estimate for this option far exceeds the EPA preferred option of controlled deconstruction of the structure. Current conditions pose an extreme safety hazard for any potential stabilization work and the City has no developers interested in the building.

C. State and Local Authorities' Roles

1. State and local actions to date

No State or local response actions have been taken to address the asbestos releases at the Site. The Illinois EPA Brownfields Program has offered funds through the revolving loan program, but the City does not believe it has the financial resources to repay the loan. The owner's response to the City has only been an offer to donate the property to the City. The City does not expect that the owner will conduct any cleanup at the Site.

2. Potential for continued State/local response

Illinois EPA and the local government do not have the resources at this time to address the release of asbestos into the environment at the Site. In an e-mail sent to EPA dated September 25, 2014, the City of Ottawa requested assistance from EPA to conduct a time-critical removal action at the Little City Building Site.

In a letter dated April 1, 2015, Bruce Everetts with the IEPA Office of Site Evaluation requested EPA's assistance in mitigating the potential threats at the Site.

III. THREATS TO PUBLIC HEALTH OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions present at the Site present a substantial threat to the public health or welfare, and the environment, and meet the criteria for a time-critical removal action as provided for in the NCP, 40 C.F.R. § 300.415(b). These criteria include, but are not limited to, the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

Results of the City's Asbestos Inspection found significant asbestos contamination throughout the Site. Bulk samples collected inside contained 1 to 20 percent chrysotile asbestos. Air cell pipe insulation contained 15 to 20 percent chrysotile asbestos and boiler insulation appeared to contain asbestos but was not sampled due to dangerous site conditions.

The building is structurally unsound and poses a significant threat of release of asbestos if a catastrophic failure occurs. Asbestos is a hazardous substance under CERCLA. The Site is not adequately secured, and is located in the downtown business district area, posing significant exposure threat to adjacent businesses and pedestrians in the area.

Asbestos is the name given to a number of naturally occurring fibrous minerals having high tensile strength, the ability to be woven, and resistance to heat and most chemicals. Because of these properties, asbestos fibers have been used in a wide range of manufactured goods, including roofing shingles, ceiling and floor tiles, paper and cement products, textiles, coatings, and friction products such as automobile clutch, brake, and transmission parts.

EPA's Integrated Risk Information System (IRIS), the Department of Health and Human Services (DHHS) and the International Agency for Research on Cancer (IARC) consider chrysotile, as well as other forms of asbestos, to be human carcinogens.

Exposure to airborne friable asbestos may result in a potential health risk because persons breathing the air may breathe in the asbestos fibers. Chronic inhalation exposure to excessive levels of asbestos fibers suspended in air can result in lung disease such as asbestosis, mesothelioma, and lung cancer. Sub-acute exposures as short as a few days have been shown to cause mesothelioma.

According to ATSDR asbestos mainly affects the lungs and the membrane that surrounds the lungs. Breathing high levels of asbestos fibers for a long time may result in scar-like tissue in the lungs and in the pleural membrane (lining) that surrounds the lung. This disease is called asbestosis and is usually found in workers exposed to asbestos, but not in the general public. People with asbestosis have difficulty breathing, often a cough and, in severe cases, heart enlargement. Asbestosis is a serious disease and can eventually lead to disability and death. ATSDR also indicates that breathing lower levels of asbestos may result in changes called plaques in the pleural membranes. Pleural plaques can occur in workers and sometimes in people living in areas with high environmental levels of asbestos. Effects on breathing from pleural plaques alone are not usually serious, but higher exposure can lead to a thickening of the pleural membrane that may restrict breathing.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

The Site is deteriorating due to exposure to the environment. The roof of the building has partially collapsed, and the building is not structurally stable.

The weather at the Site is average for Illinois. It is reasonable to assume that severe weather may impact the Site. Ongoing water impacts to the interior of the west wall of the building continue to deteriorate the integrity of the brick, causing the wall to bow out. Normal weather conditions, such as snow, rain and wind, will continue to be the main cause of hazardous substance release, and increase the possibility of a complete structural failure of the building.

Threat of fire or explosion.

According to the City of Ottawa, the Site is susceptible to vandalism. The Site cannot be adequately secured from trespassers because of the buildings' dilapidated condition. Vandals can reasonably be expected to cause fires at the Site that would potentially release asbestos from

the smoke plume into the surrounding community. The current structure has no operating fire alarm or sprinkler system.

The availability of other appropriate federal or state response mechanisms to respond to the release.

Based on the information currently available, neither the State, nor the City of Ottawa have the funds or resources at this time to respond to a time-critical removal action of this magnitude.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known and suspected hazardous substances on Site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this Site may present an imminent and substantial endangerment to public health, or welfare, or the environment, if not addressed by implementing the response actions selected in this Memorandum.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances on Site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on Site will include:

- 1) Developing and implementing a Site Health and Safety Plan to include a Perimeter Air Monitoring and Sampling Plan and developing measures to control ACM dust during the removal and deconstruction of the facility;
- 2) Developing a site-specific sampling plan to conduct additional characterization of the Site and thereby determine the nature and extent of asbestos contamination in the building debris;
- 3) Deconstruct the building at the Site to remove, excavate, recycle, load, transport, and dispose of readily identifiable ACM;
- 4) Remove debris and clean subsurface foundation, leaving exterior walls of foundation below grade intact, backfill with suitable materials agreeable to the City of Ottawa;
- 5) Removal of asbestos-contaminated debris in and around the Site that presents an unacceptable risk to public health and the environment;

6) Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants at a EPA-approved disposal facility in accordance with EPA's Off-Site Rule (40 C.F.R. §300.440);

7) Conducting post-confirmation sampling in accordance with the site-specific sampling plan to confirm the removal action's efficacy;

8) Backfilling excavated areas with clean material and topsoil, restoring other disturbed areas;

9) Taking other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to public health or the environment.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has determined that post-removal Site control consistent with the provisions of the NCP at 40 C.F.R. § 300.415(l) of the NCP will not be required upon completion of this removal action.

The threats the asbestos debris pose meet the criteria listed in NCP at 40 C.F.R. § 300.415(b), and the response actions proposed herein are consistent with any long-term remedial actions that may be required. However, eliminating hazardous substances, pollutants and contaminants that pose a substantial threat of release is expected to greatly minimize substantial requirements for post-removal Site controls.

Off-Site Rule

All hazardous substances, pollutants, or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored or disposed of at a facility in compliance, as determined by EPA, with the EPA Off-Site Rule at 40 C.F.R. § 300.440.

2. Contribution to remedial performance:

The proposed action will not impede future actions based on available information. No long-term remedial actions are anticipated for the Site.

3. Engineering Evaluation/Cost Analysis (EE/CA)

Not Applicable. 40 C.F.R. 300.415(a)(4) does not require an EE/CA when less than a 6-month planning period exists before the on-site response must be initiated.

4. Applicable or relevant and appropriate requirements (ARARs)

All applicable, relevant and appropriate requirements (ARARs) of federal and State law will be complied with to the extent practicable considering the exigencies of the circumstances.

Federal

EPA National Emissions Standards for Hazardous Air Pollutants at 40 C.F.R. Part 61, Subparts A and M.

State

An e-mail message was sent to Bruce Everetts of IEPA, asking for any State of Illinois ARARs. All state ARARs identified in a timely manner will be complied with to the extent practicable during this removal action.

5. Project Schedule

The removal activities are expected to take approximately 40 on-site working days to complete.

B. Estimated Costs

REMOVAL ACTION PROJECT CEILING ESTIMATE	
<u>Extramural Costs:</u>	
<u>Regional Removal Allowance Costs:</u>	
Total Cleanup Contractor Costs (This cost category includes estimates for ERRS, subcontractors, Notices to Proceed, and Interagency Agreements with Other Federal Agencies. Include a 15% contingency)	\$ 925,934
<u>Other Extramural Costs Not Funded from the Regional Allowance:</u>	
Total START, including multiplier costs	\$ 85,000
Total Decontamination, Analytical & Tech. Services (DATS)	\$ 0
Total CLP	\$ 0
Subtotal	\$ 85,000
Subtotal Extramural Costs	\$1,010,934
Extramural Costs Contingency (15% of Subtotal, Extramural Costs)	\$ 151,640
TOTAL REMOVAL ACTION PROJECT CEILING	\$ 1,162,574

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the Site that may pose an imminent and substantial endangerment to public health and safety and the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Given the Site conditions, the nature of the hazardous substances and pollutants or contaminants documented on Site, and the potential exposure pathways to nearby populations described in Sections II, III and IV, above, failing to take or delaying action may present an imminent and substantial endangerment to public health, or welfare, or the environment. Such failure to act would likely increase the potential that those hazardous substances would be released, thereby threatening the adjacent population and the environment.

VII. OUTSTANDING POLICY ISSUES

The removal involves a nationally significant issue because the principal contaminant addressed by the removal is ACM.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$1,909,440.¹

$$(\$1,162,574 + \$50,000) + (57.47\% \times \$1,212,574) = \$1,909,440$$

¹ Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Little City Building Site, Ottawa, LaSalle County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the Site (Attachment 5). Conditions at the Site meet the NCP criteria for a removal action at 40 C.F.R. § 300.415(b), and I recommend your approval of the removal action proposed in this Action Memorandum.

The total project ceiling if approved will be \$1,162,574, of which an estimated \$1,077,574 may be used for cleanup contractor costs. You may indicate your approval by signing below.

Approve: Richard C. Kelly 5-19-15
Director, Superfund Division Date

Disapprove: _____
Director, Superfund Division Date

Enforcement Addendum

Figure 1 Site Location Map

Figure 2 Site Layout Map

Attachments:

1. Analytical Results
2. Photographs
3. Detailed Cleanup Contractor Cost Estimate
4. Independent Government Cost Estimate
5. Administrative Record Index

cc: B. Schlieger, EPA 5202 G (email: schlieger.brian@epa.gov)
L. Nelson, U.S. DOI, **w/o Enf. Addendum**
(email: lindy_nelson@ios.doi.gov)
B. Everetts, Illinois EPA, **w/o Enf. Addendum**
(email: bruce.everetts@illinois.gov)

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**NOT RELEVANT TO SELECTION
OF REMOVAL ACTION**

ENFORCEMENT ADDENDUM

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ENFORCEMENT CONFIDENTIAL

NOT SUBJECT TO DISCOVERY

FOIA EXEMPT

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

Figure 1

**Site Location Map
Little City Building Site
Ottawa, Illinois**

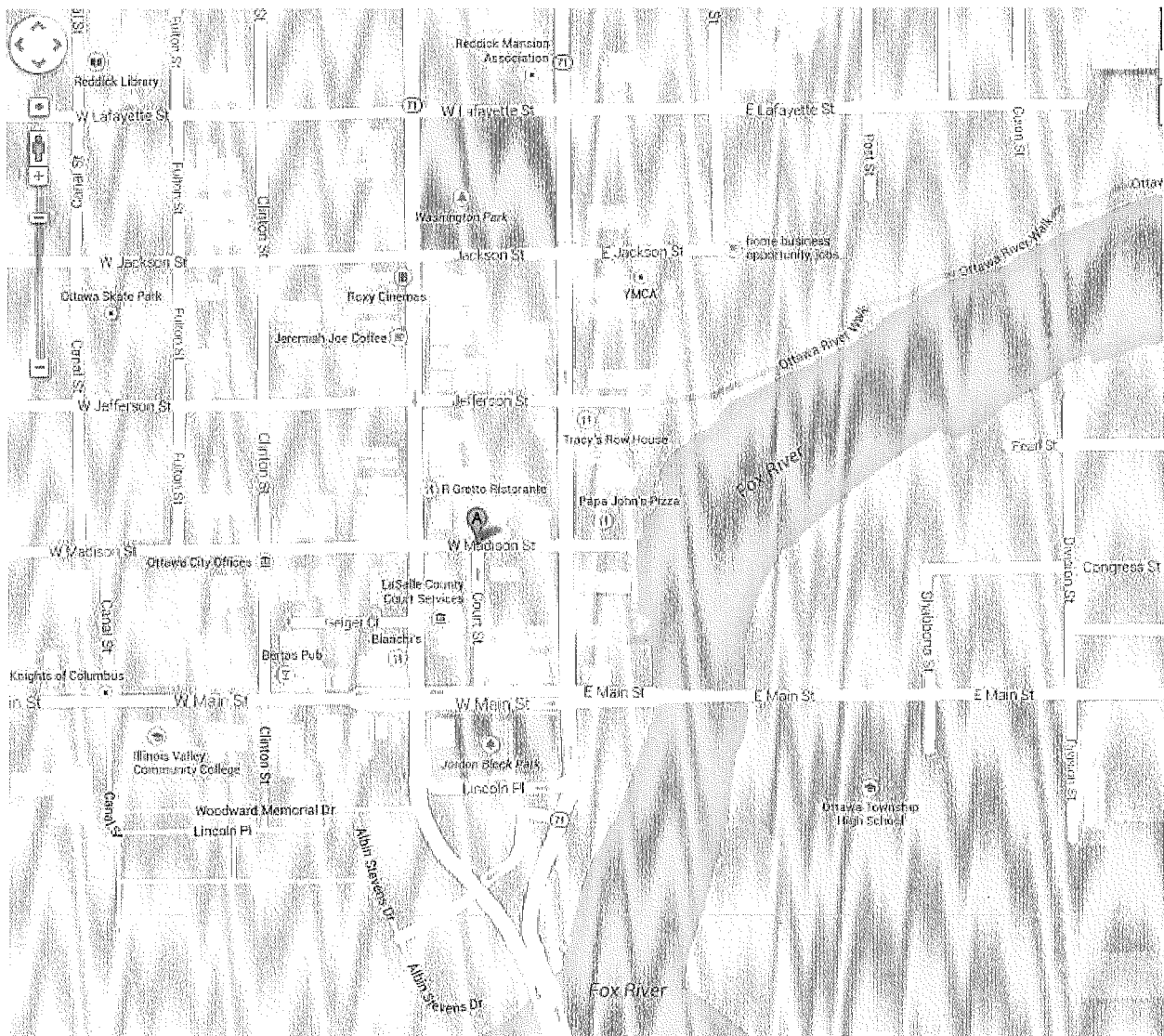


FIGURE 2

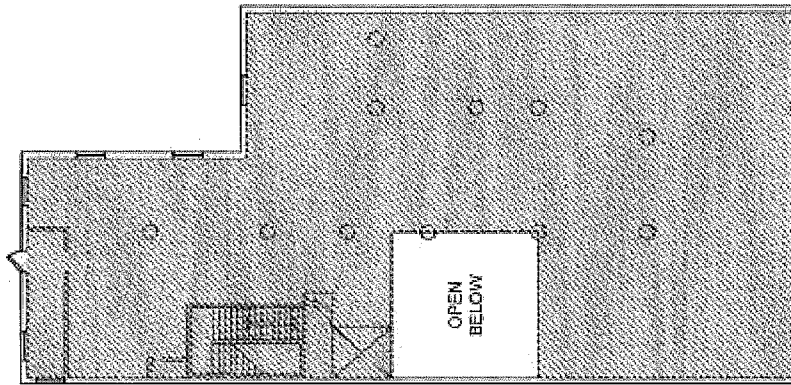
SITE LAYOUT
Little City Building Site
Ottawa, Illinois



Site Layout Cont.


HOMOGENEOUS AREA:
 DESCRIPTION:
 QUANTITY ESTIMATE:
 ACM Y/N:
 COMMENTS:

1PA
 Air Cn-Fire Protection/DCS
 34,300 S.F. & Contamination On Floors & 200 L.F. On Piping
 Yes
 Visible Debris Throughout - All Floors - Insect in Basement - Entire Floor
 & Items on it Contaminated



1ST FLOOR



Consultant:		Client:		Project Location:	
 Wilkerson Environmental Consulting & Construction, Inc. Construction - Remediation - Investigation	200 Prairie Street, Suite 208 Rockford, IL 61107	Brian Graham & Associates 112 W. Madison Street Ottawa, IL 61340		REV NO DATE	

ATTACHMENT 1

ANALYTICAL RESULTS Little City Building Site Ottawa, Illinois



348 North Ashland Ave. STE 2C
Chicago, Illinois 60607
312.850.3300 t 312.850.3303 f
mtl@metrotechlab.com



NVLAP Lab Code 200721-0

Polarized Light Microscopy Asbestos Analysis Report
Method EPA-600/M4-82-020

MTL Batch #: 9078
Date Received: 1/20/14
Received By: N. Lopez
Date Analyzed: 1/23/14
Analyzed By: N. Lopez
Date Reported: 1/27/14
Turnaround Time: 5 Day

Client: Stephen Merwin
Midwest Env. Consulting Services,
Inc.
4 Bonnie Lane
Yorkville, IL 60560
(630) 553-3989 t

Project Name: Fehr Graham & Associates
Project #: 14-01-015-INSP
Project Location: Former Commercial Building

This report does not constitute any approval or endorsement by NVLAP, NIST, or any Federal Government agency.

MTL Sample ID	Client Sample ID	Material Description	Color	Hom	Asbestos	%	Non Asbestos	%
9078 - 1	TPA-1	Air Cell	Grey	Yes	Chrysotile	15-20	Cellulose	80-85

(Full analytical results are located in the Administrative Record and the OSC Website)

ATTACHMENT 2

SITE PHOTOGRAPHS Little City Building Site Ottawa, Illinois

Former Commercial Building
112 W. Madison Street, Ottawa, IL 61350



Homogeneous Area:	TPA
Material Description:	Air Cell Pipe Insulation/Debris
Location:	Basement Through 5 th Floor – Throughout
ACM Y/N:	Yes

Comments: Visible Debris Throughout – All Floors – Heaviest in Basement
Entire Floor & Items on it Contaminated.

Former Commercial Building
112 W. Madison Street, Ottawa, IL 61350



Homogeneous Area:	TPB
Material Description:	Layered Paper Pipe Insulation/Debris
Location:	2nd Floor – In Walls & Above Ceiling
ACM Y/N:	Yes

Comments: Debris Quantity Included with TPA.

Site Photographs Cont.



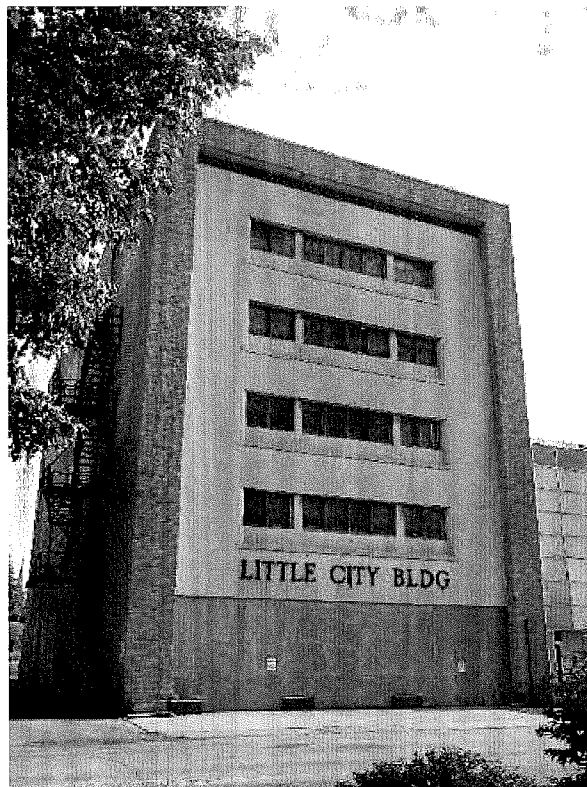
Photograph No. 9. Looking up along south side of collapsed bay.

4



Photograph No. 10. Showing sagging floor at fourth floor level.

Site Photographs Cont.



Photograph No. 1. Looking north at south elevation.



Photograph No. 2. Looking east at west elevation showing infilled windows, brick spalling, and missing bricks and mortar.

Site Photographs Cont.



Photograph No. 8. Collapsed bay at first floor. Note sagging floor joists.

ATTACHMENT 3

DETAILED CLEANUP CONTRACTOR ESTIMATE

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**NOT RELEVANT TO SELECTION
OF REMOVAL ACTION**

ATTACHMENT 4

INDEPENDENT GOVERNMENT COST ESTIMATE

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NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ATTACHMENT 5

**U.S. Environmental Protection Agency
Removal Action
Administrative Record
Little City Building Site
Ottawa, Illinois**

Original

No.	Date	Author	Recipient	Title/Description	Pages
1	2/19/2014	Midwest Env. Consulting	City of Ottawa	Asbestos Survey Report	42
2	9/29/2014	FehrGraham Engineering	City of Ottawa	Remedial Planning Proposal	16
3	Pending	Benning, B U.S.EPA	Karl, R., U.S. EPA	Action Memorandum: Request for Approval and Funding for a Time-Critical Removal Action at the Little City Building Site	
4	2/12/2015	Tetra Tech	USEPA	Little City Building Findings Report	12